

1

2

3

4

5

6

7

8

9

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10

SAN FRANCISCO DIVISION

11

RICHARD KADREY, *et al.*,

Case No. 3:23-cv-03417-VC-TSH

12

Individual and Representative Plaintiffs,

**DECLARATION OF NIKKI K. VO IN
SUPPORT OF UNOPPOSED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL JOINT
DISCOVERY LETTER BRIEFS (DKTS. 308 &
309)**

13

v.

14

META PLATFORMS, INC., a Delaware
corporation;

15

Defendant.

16

17

18

19

20

21

22

23

24

25

26

27

28

1 I, Nikki K. Vo, hereby declare:

2 1. I am Director and Associate General Counsel for Defendant, Meta Platforms, Inc.
 3 (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify
 4 as a witness, could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal
 6 portions of the Parties' Joint Discovery Letter regarding Meta's responses to Plaintiffs' Requests
 7 for Production Nos. 118 and 119 (“RFP Joint Letter Brief”) and Joint Discovery letter regarding
 8 Meta's privilege redactions (“Privilege Letter Brief”). The motion seeks to have the following
 9 partially sealed:

10 Document	11 Sealing Request
11 RFP Joint Letter Brief	12 • Redacted portions
12 Privilege Letter Brief	13 • Redacted portions

14 3. The redacted portions of the RFP Joint Letter Brief refer to Meta's highly sensitive,
 15 confidential practices and processes surrounding its Llama models and the datasets used to train
 16 the Llama models. The information in the redacted portions is based on documents produced by
 17 Meta designated “Highly Confidential – Attorneys' Eyes Only” and “Confidential” under the
 18 Stipulated Protective Order. Public disclosure of the information contained in these portions
 19 exposes Meta to the risk of competitive harm.

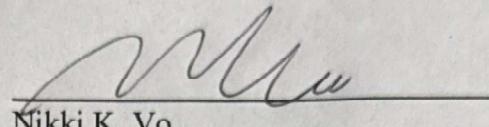
20 4. The redacted portions of the Privilege Joint Letter Brief contain significant
 21 discussion and descriptions, including quotes from the confidential documents themselves, of
 22 Meta's highly confidential internal communications and documents. These documents and
 23 communications were produced in this litigation and marked “Highly Confidential – Outside
 24 Attorneys' Eyes Only.” Public disclosure of the information contained in these portions exposes
 25 Meta to the risk of competitive harm.

26 5. Public disclosure of the redacted information in the documents above exposes Meta
 27 to the risk of competitive harm by revealing Meta's non-public information pertaining to the
 28

1 development of its generative AI offerings, as well as its confidential business strategies, processes,
2 and relationships. Meta takes steps to carefully protect the confidentiality of information of this
3 sort.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct

6 Executed in Oakland, California on this 4th day of December, 2024.

7
8 
9

Nikki K. Vo

10 311587365
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28